

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*	
MARITZA SOLA MORALES	*	CASE NO. 15-03511 BKT
	*	CHAPTER 13
Debtor	*	INDEX
-----	*	
CITI MORTGAGE, INC.	*	
	*	
Movant	*	
	*	
MARITZA SOLA MORALES;	*	
ALEJANDRO OLIVERAS RIVERA, TRUSTEE	*	
	*	
<u>Respondent (s)</u>	*	

**DEBTOR'S INFORMATIVE MOTION  
RE: CURING OF POST-PETITION ARREARS TO  
CITI MORTGAGE INC. (MOVANT) PURSUANT TO ORDER  
DOCKET NO's. 52, 56, & 59**

TO THE HONORABLE COURT:

NOW COMES, **MARITZA SOLA MORALES**, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On October 19, 2016, movant Citi Mortgage, Inc. ("CITI") filed a motion for relief from stay, docket no. 52, stating that the debtor was in post-petition mortgage loan arrears, in the above captioned index.

2. On November 01, 2016, the debtor filed her reply to CITI's 362 Motion requesting an extension of time to cure the post-petition arrears. *Debtor's Reply*, docket no. 56.

3. At the preliminary hearing scheduled for November 15, 2016, This Honorable Court Ordered the debtor to cure the arrears within forty five (45) days or the stay was to be lifted. *ORDER*, docket #59.

Page -2 –

**Informative Motion: Curing of Arrears**

**Case no. 15-03511 BKT13**

4. The debtor hereby respectfully informs this Honorable Court that on November 13, 2016, the debtor paid the sum of \$588.51, on November 30, 2016 the debtor paid the sum of \$588.51 and on December 15, 2016, the debtor paid the sum of \$987.98, for a total paid to CITI of \$2,165.00 which includes the sum of \$1,514.90 and the sum of \$650.00 for attorneys fees and costs. Attached is evidence of said payments.

5. Based on the aforestated, the debtor hereby respectfully requests this Honorable Court be informed of the foregoing concerning CITI's §362 motion.

**WHEREFORE**, debtor respectfully requests this Honorable Court be informed of the foregoing, in the present case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq., Sarah M Vega Bonilla, Esq., Martinez & Torres Law Offices PSC, Counsel for CITI Mortgage Inc; I also certify that a copy of this motion was sent via US Mail to: Maritza Sola Morales, Turabo Gardens I N 16 Calle 11 Caguas PR 00727, debtor in the above captioned case.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 19<sup>th</sup> day of December, 2016.

*/s/Roberto Figueroa Carrasquillo*

USDC #203614

RFIGUEROA CARRASQUILLO LAW OFFICE PSC

ATTORNEY FOR DEBTOR/RESPONDENT

PO BOX 186 CAGUAS PR 00726

TEL NO 787-744-7699 FAX NO 787-746-5294

Email: [rfigueroa@rfclawpr.com](mailto:rfigueroa@rfclawpr.com)

RECEIPT/RECIBO

Thank you/Gracias

TRACKING NUMBER (MTCN)/  
NO. DE CONTROL DEL ENVIO:  
697-682-3181

For Customer Service, please call 1-800-325-6000/Para comunicarse con el servicio de atención al cliente, llame al 1-800-325-6000

My WU® #  
Total Points/Puntos totales

KMART #4858  
400 BETANCES ST & PR #156, PR

Payments/Servicio de Pago de Facturas  
CASH

Operator ID/No. ID del Operador: L59

Date of Transaction/Fecha de Transacción	November 13, 2016/Noviembre 13, 2016
Time of Transaction/Hora de la Transacción	14:45:00 EST
Sender/Remitente	MARITZA SOLA MORALES TURABO GARDENS C/11 N-16, CAGUAS, PR, 00726, USA 7875334119
Receiver/Destinatario	CITIMORTGAGE
Account #/ No de Cuenta	*****9637
Code City/ Código de la Ciudad	EMI MO
Reference #/ No de Referencia	NONE
Expected Payout Location/ Localidad donde Esperan Pago	United States
Service Type/Tipo de Servicio	2nd Business Day
Transfer Amount/ Cantidad de Envío	588.41 USD
Transfer Fees/ Cargos por Envío	+ 9.50 USD
Additional Fees/ Cargos Adicionales	+ 0.00 USD
Transfer Taxes/ Impuestos de Envío	0.00 USD
Promotion Discount/ Descuento Promocional	USD
Total to Receiver/Total al Destinatario	588.41 USD

SEVEN  
LW



# RECEIPT/RECIBO

Thank you/Gracias

TRACKING NUMBER (MTCN)/  
NO. DE CONTROL DEL ENVIO:  
915-566-6028

For Customer Service, please call 1-800-325-6000/Para comunicarse con el servicio de atención al cliente, llame al 1-800-325-6000

My WU® #  
Total Points/Puntos totales

KMART #4858  
400 BETANCES ST & PR #156, PR

Payments/Servicio de Pago de Facturas  
CASH

Operator ID/No. ID del Operador 177

Date of Transaction/Fecha de Transacción  
November 30, 2016/Noviembre 30, 2016

Time of Transaction/Hora de la Transacción  
14:40:00 EST

Sender/Remitente  
MARITZA SOLA MORALES  
TURABO GARDENS C/11 N-16, CAGUAS, PR,  
00725, USA  
7876334119

Receiver/Destinatario  
CITIMORTGAGE

Account #/No. de Cuenta \*\*\*\*\*9637

Code City/Código de la Ciudad CMI MO

Reference #/No. de Referencia NONE

Expected Payout Location/  
Localidad donde Esperar Pago  
United States

Service Type/Tipo de Servicio  
2nd Business Day

Transfer Amount/Cantidad de Envío 588.51 USD

Transfer Fees/Cargos por Envío + 9.50 USD

Additional Fees/Cargos Adicionales + 0.00 USD

Transfer Taxes/Impuestos de Envío + 0.00 USD

Promotion Discount/Descuento Promocional USD

Total / Total 598.01 USD

Total to Receiver/Total al 588.51 USD

RECEIPT/RECIBO

TRACKING NUMBER (MTCN)/  
NO. DE CONTROL DEL ENVIO

594-658-4784

For Customer Service, please call 1-800-325-6000/Para comunicarse con el servicio de atención al cliente, llame al 1-800-325-6000

My WUC #  
Total Points/Puntos totales

KMART #4858  
400 BETANCES ST & PR # 156, PR

Payments/Servicio de Pago de Facturas  
CASH

Operator ID/No. ID del Operador: L59

Date of Transaction/Fecha de Transacción	December 15, 2016/Diciembre 15, 2016
Time of Transaction/Hora de la Transacción	20:03.00 EST
Sender/Remitente	MARITZA SOLA MORALES TURABO GARDENS C/11 N-16, CAGUAS, PR. 00725, USA 7875334119
Receiver/Destinatario	CITIMORTGAGE
Account #/ No. de Cuenta	*****9637
Code City/ Código de la Ciudad	CMI MO
Reference #/ No. de Referencia	NONE
Expected Payout Location/ Localidad donde Esperan Pago	United States
Service Type/Tipo de Servicio	2nd Business Day
Transfer Amount/ Cantidad de Envio	987.98 USD
Transfer Fees/ Cargos por Envio	9.50 USD
Additional Fees/ Cargos Adicionales	+ 0.00 USD
Transfer Taxes/ Impuestos de Envio	+ 0.00 USD
Promotion Discount/ Descuento Promocional	USD
Total / Total	987.48 USD
Total to Receiver/Total al Destinatario	987.98 USD